



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL  
BROOKLYN OFFICE

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U.S. DISTRICT COURT, E.D.N.Y.

★ OCT 5 2005 ★

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September 29, 2005

BY FACSIMILE TRANSMISSION

Honorable John Gleeson  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

*Granted.*  
*So ordered*

s/John Gleeson

*usd*  
*10-2-05*

Re: Hirschfeld, et al., v. Carpinello, et al.  
Eastern District of New York CV-05-4310 (JG) (CLP)

Dear Judge Gleeson:

This office represents the defendants, Sharon Carpinello, Commissioner of the New York State Office of Mental Health ("OMH"), Martin Darcy, Acting Executive Director of Kingsboro Psychiatric Center ("KPC"), Mark Lerman, Clinical Director of KPC, Johanna Maiorano, Director of Risk Management at KPC, James McCummings, Chief of Service at KPC, Charles White, Chief of Service at KPC, Barbara Burroughs, Treatment Team Leader at KPC, Dennis Mahoney, Treatment Team Leader at KPC, Wilma Peterson, Treatment Team Leader at KPC and Tanya Riester, Treatment Team Leader at KPC in the above-referenced action.

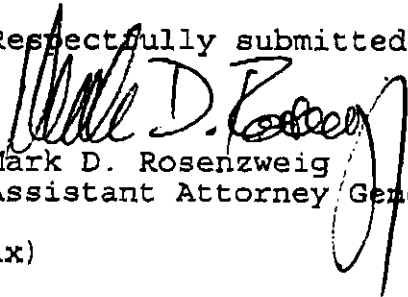
We write at this time, after consulting with plaintiff's counsel, to request an extension of time to answer or move with respect to the complaint which was served earlier this month. Requests for representation were received late last week. Based upon the information we have regarding service, defendants' response to the complaint is currently due on October 6, 2005. We are requesting, and plaintiffs' counsel has consented, that defendants time to respond to the complaint be extended to November 10, 2005, if that is agreeable to the Court. No previous requests have been made regarding this complaint.

The extension is necessary to allow us to fully investigate the claims made by the multiple (11) patient

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plaintiffs and to consult with all our clients concerning the  
circumstances and issues raised by the complaint.

Respectfully submitted,

  
Mark D. Rosenzweig  
Assistant Attorney General

cc: Christine E. Morton, Esq. (By Fax)